

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT COURT**

UNITED STATES OF AMERICA	:	
	:	
	:	: Criminal No. 04-287
	:	
	:	: Date Filed:
v.	:	
	:	: VIOLATIONS:
	:	: 18 U.S.C. §2113(a) and (d)
	:	: (armed bank robbery - 1 count)
	:	: 18 U.S.C. § 2113(a) and (d)
	:	: (attempted armed bank robbery - 1 count)
	:	
	:	: Notice of forfeiture
JEFFREY JOHNSON	:	

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times material to this Indictment:

1. Citizens Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).
2. On or about March 31, 2004 in the Eastern District of Pennsylvania, defendant

JEFFREY JOHNSON

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Citizens Bank [hereafter “the Bank”] lawful currency of the United States, that is, approximately \$2,294 belonging to, and in the care, custody, control, management and

possession of the bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant JEFFREY JOHNSON knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the bank and other persons by use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Sections 2113(a) and (d).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph one of Count One is incorporated by reference here.
2. On or about April 29, 2004, in the Eastern District of Pennsylvania,

defendant

JEFFREY JOHNSON

knowingly and unlawfully, by force and violence, and by intimidation, attempted to take from employees of the Citizens Bank, [hereafter “the Bank”], lawful currency of the United States belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant JEFFREY JOHNSON knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Bank, and other persons, by use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Section 2113(a) and (d).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Section 2113(a) and (d), set forth in Count One this Indictment, the defendant

JEFFREY JOHNSON

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the violations of Title 18, United States Code, Section 2113(a) and (d), as charged in this Indictment, including, but not limited to, the sum of \$ 2,294.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture .

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY